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Attorney for Plaintiff
HARDLINE DESIGN LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HARDLINE DESIGN LLC,
Plaintiff,

vs.

EDGE INTERNATIONAL, LLC; and, B8
CONCEPT LTD.,
Defendants.

AND ALL RELATED CROSS CLAIMS

CASE NO.: 3:12-cv-04001-RS

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER**

Judge: The Honorable Richard Seeborg

Trial Date: N/A

Action Filed: July 30, 2012

INTRODUCTION

Plaintiff and Counterclaim Defendant HARDLINE DESIGN LLC (“Hardline”) and Defendant and Counterclaim Plaintiff EDGE INTERNATIONAL, LLC (“Edge”) respectfully file this joint stipulation and proposed order. The following items are currently on calendar before this Court (in chronological order):

(1) Response to Edge’s motion for summary judgment (Docket No. 16), due November 7, 2012;

(2) Joint Case Management Statement and Rule 26(a)(1) disclosures, due November 8, 2012;

(3) Reply to Edge’s motion for summary judgment (Docket No. 16), due November 14, 2012;

(4) Case Management Conference and hearing on Hardline’s motion to dismiss (Docket No. 13), on November 15, 2012; and

(5) Hearing on Edge’s motion for summary judgment (Docket No. 16), on November 29, 2012.

Subject to the Court’s approval, Hardline and Edge have agreed to an immediate and temporary 45-day stay of this case, beginning from the date of the signed Court order.

Hardline and Edge have stipulated to the following:

(1) Hardline shall send a demand of notice of arbitration pursuant to AAA rules to B8 Concept Limited, by sending such notice to:

B8 Concept Ltd.
Rm A 15/F
Hillier Commercial Building 65-67 Bonham Strand East
Sheung Wan, Hong Kong

and to b8conceptlimited@mail.com.

With a cc to Joshua Kirsch at jkirsch@gibsonrobb.com

(2) Hardline shall send a demand of notice of arbitration pursuant to AAA rules to Edge International, LLC via its counsel of record, Joshua Kirsch, by regular mail at GIBSON ROBB & LINDH, LLP, 201 Mission St., Suite 2700, San Francisco, CA 94105 and email at

1 jkirsch@gibsonrobb.com. It is the intent of the parties hereto that all three contracts in dispute
2 shall be subject to a single, binding arbitration.

3 (3) In the event that B8 Concept Limited responds to the demand and submits to
4 binding arbitration, Edge and Hardline shall stipulate to extend the 45-day stay of this Court
5 action indefinitely to permit the arbitration to proceed.

6 (4) In the event that the 45-day stay expires without further stipulation, all
7 oppositions and replies to be filed in response to the above-listed motions, to the extent such
8 oppositions and replies have not yet been filed, will be filed pursuant to Local Rule 7-3 or other
9 agreement of the parties.

10 **ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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13 Dated: 11/5/12



14 The Honorable Richard Seeborg
15 United States District Court Judge
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1 Dated: November 2, 2012

Respectfully submitted,

2 By /s/ Inder Comar

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Attorney for Plaintiff / Counterclaim
Defendant
HARDLINE DESIGN LLC

10 By /s/ Joshua Kirsch

11 Joshua Kirsch
12 GIBSON ROBB & LINDH LLP
13 201 Mission Street, Ste. 2700
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15 Telephone: (415) 348-6000
16 Facsimile: (415) 348-6001
17 Email: jkirsch@gibsonrobb.com

Attorney for Defendant / Counterclaim
Plaintiff
EDGE INTERNATIONAL, LLC

DECLARATION OF CONSENT

Pursuant to Local Rule 5-1 regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from all counsel for all parties.

/s/ Inder Comar
D. Inder Comar